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VIA ECF

Hon. Valerie E. Caproni
United States District Court
Southern District of New York
Thurgood Marshall Courthouse
40 Foley Square, New York, NY 10007

Re: Kane, et al v. de Blasio, et al
Docket 21 civ 7863

Dear Judge Caproni,

In light of the Court's communication regarding witnesses, I respectfully propose the Court accept the attached declaration from Amanda Ruiz in lieu of testimony. Ms. Ruiz will be at Court as well if live testimony is preferred and the Court deems it relevant.

As to the other plaintiffs, the purpose for calling them is to put on the record any updates about their status – for example, after our hearing last week, several more plaintiffs were denied and placed on leave without pay. We intended to put that information in the record through testimony, but I can submit additional declarations if the court would prefer.

Respectfully Submitted,

/s/ Sujata S. Gibson
Counsel for the Plaintiffs

Cc: All counsel via ECF